

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 1, 2009

Claude Zobell, Treasurer Searchlight Leadership Fund 607 14th Street NW, Suite 800 Washington, DC 20005

Response Due Date: June 1, 2009

Identification Number:

C00327395

Reference:

October Monthly Report (9/1/08-9/30/08), <u>12 Day Pre-General Report</u> (10/1/08-10/15/08), 30 Day Post General Report (10/16/08-11/24/08),

and Year End Report (11/25/08-12/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 2 items:

- 1. Please clarify all expenditures made for "Catering," "Event Coordination Services," "Equipment Rental Fee" paid to "Event Rents Inc." and "Catering & Travel" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1
- 2. Schedule B discloses an expenditure(s) for "Communications Consulting Services." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this